

Investigation into the Wholesale Billing Practices of  
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

*This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.*

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail ([nicholas.linden@psc.state.wi.us](mailto:nicholas.linden@psc.state.wi.us)) no later than the close of business (COB) Friday, July 25, 2003.*

Submitted by: SBC

Contact: **Richelle Barker**  
Telephone Number: **(414)-227-6915**  
e-mail: **rb8434@sbc.com**

Subject Matter Expert (SME): **Carol Retzlaff**  
Telephone Number: **(414)273-8639**  
e-mail: **cr3741@sbc.com**

Authorized Representative: **Brian Van Hoof**  
Telephone Number: **(414)-227-6981**  
e-mail: **bv3165@sbc.com**

Name: **Facility Disputes**

**Brief Description:** *CLECs have incorrectly billed SBC charges associated with interconnection facilities. CLECs have billed SBC for circuits that have been disconnected. CLECs have billed inappropriate rate elements to SBC. Finally, CLECs have billed SBC beyond the 120 day back billing provision provided in the ICA. CLECs involved are:*

<p>3. What performance measures can be implemented to monitor the desired system operation?</p> <p>4. Any other pertinent information?</p>
<p><b>B. Prior Attempts to Resolve the Issue</b></p> <p>1. Last known position of the submitting carrier.</p> <p>2. Were any bill adjustments made to resolve this issue?</p> <p>3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).</p> <p>4. Identify any other carrier(s) known to have experienced similar problems.</p> <p>5. Did you identify any other problems arising from or related to this issue?</p> <p>6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).</p> <p>7. Were any policies or procedures changed to address this issue? If so, what changes were made?</p>
<p>Submitted by: <i>(Name of Carrier)</i></p> <p>Contact <i>[Name of Carrier Representative]</i></p> <p>Telephone Number: <i>(NPA)-NXX-XXXX</i></p> <p>e-mail:</p> <p>Subject Matter Expert (SME): <i>(Name)</i></p> <p>Telephone Number: <i>(NPA)-NXX-XXXX</i></p> <p>e-mail:</p> <p>Authorized Representative: <i>(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)</i></p> <p>Telephone Number: <i>(NPA)-NXX-XXXX</i></p> <p>e-mail:</p>

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Name: **Minute of Use Disputes**  
Brief Description: **CLECs have billed SBC for local and intralata toll minutes of use that did not originate from SBC end users. The total outstanding dispute is approximately \$12M. CLECs involved are:**  
**Northern Telephone and Data**  
**Net LEC**  
**ATT**

*the same trunk groups.*

4. Were any bill adjustments made to resolve this issue? *In some cases, adjustments have been made, but only after extensive analysis of CLEC billing systems and data exchanges.*
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

*(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) SBC seeks to have CLECs credit SBC for minutes of use that SBC has disputed because those minutes did not originate from SBC end users. SBC also requests that CLEC refrain from billing SBC for these minutes of use on all future invoices.*

*(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)*

**A. Analysis of Issue**

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

**B. Prior Attempts to Resolve the Issue**

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

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Name: **Port Back Charges**  
Brief Description: **CLECs are inappropriately billing SBC for charges associated with SBC's win or win back of end users even though the FCC has stated that cost recovery associated with portability must be competitively neutral. The CLECs have also attempted to circumvent the interconnection agreement by attempting to justify such charges in a tariff. SBC takes the position that a charge from a CLEC to SBC is not competitively neutral, not contained in the ICA and should not be charged to SBC.**

*(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)*

**A. Analysis of Issue**

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

**B. Prior Attempts to Resolve the Issue**

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

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Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

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Name: **Rate Disputes**  
Brief Description: **CLECs have billed SBC incorrect rates for both local and intraLata toll usage. The outstanding dispute amounts for local rate disputes is approximately \$.3M and \$.7M for intraLata toll rate disputes. CLECs that have billed incorrect rates include:**  
**Northern Telephone & Data**  
**Net Lec**

*(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)*

**A. Analysis of Issue**

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
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